

EPA REGISTRATION NUMBER 87373-61 – VOL. 1



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7504P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

EPA Registration
Number:
83520-8

Date of Issuance:
AUG - 2 - 2011

NOTICE OF PESTICIDE:

☒ Registration
☒ Reregistration

(under FIFRA, as amended)

Term of Issuance: **Unconditional**

Name of Pesticide Product:
Dicamba Acid Technical

Name and Address of Registrant (include ZIP Code):

Tacoma Ag, LLC
P.O. Box 14073
Durham, NC 27709

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

EPA received a label amendment request submitted on June 27, 2011. EPA grants this request under the authority of section 3(c)(5) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended. With this accepted labeling, all requirements set forth in the Reregistration Eligibility Decision (RED) for **dicamba** have been satisfied. Therefore, EPA reregisters the product listed above. This action is taken under the authority of section 4(g)(2)(c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.

Submit one (1) copy of final printed labeling. Amended labeling will supersede all previously accepted labels. A copy of your label stamped "Accepted" is enclosed for your records. Products shipped after twelve (12) months from the date of this Notice or the next printing of your label, whichever occurs first, must bear the new revised label.

If you have any questions regarding this Notice, please contact Beth Benbow at (703) 347-8072 or at benbow.bethany@epa.gov.

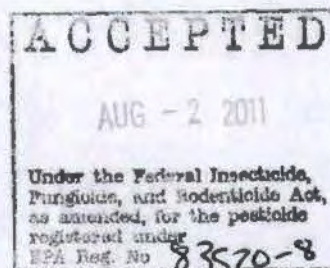
Signature of Approving Official:

Kathryn V. Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)

Date:

AUG - 2 - 2011

Dicamba Acid Technical For Manufacturing Purposes Only



Active Ingredient:

Dicamba: (3,6-dichloro-o-anisic acid).....98.5%
Related Compounds:..... 1.5%
TOTAL.....100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If Swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical information.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

EPA Reg. No. 83520-8

EPA Est. No. 83047-CHN-001

Net Weight: 1,764 lbs. (800 kg)

Manufactured for:
Tacoma AG, LLC
P.O. Box 14073
Durham, NC 27709

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only For Formulation Into A Herbicide (1) For The Following Use(s): Small grains, Corn, Sorghum, Sugarcane, Golf course and Residential Lawns, Sod farms, Pastures, Rangeland, and Rights-of-Ways;

(2) Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with US EPA regulations.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with US EPA data submission requirements regarding support of such use(s).

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store in original container, in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained carefully swept up and collected for disposal. Wash area of spill with detergent and water.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Bags: Completely empty bag into manufacturing equipment by shaking and tapping sides and bottom to loosen clinging particles. If not emptied in this manner, the bag may be considered an acute hazardous waste and must be disposed in accordance with local, state and federal regulations. When completely empty, **offer for recycling is available**, or dispose of bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. **Fiber Drums with Liners:**

Completely empty liner into manufacturing equipment by shaking and tapping sides and bottom to loosen clinging particles. If not emptied in this manner, the liner may be considered an acute hazardous waste and must be disposed in accordance with local, state and federal regulations. When completely empty, **offer for recycling is available**, or dispose of liner in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. If the drum is contaminated and can not be reused, **offer for recycling if available**, or dispose of in the same manner as the liner.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Tacoma AG, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Tacoma AG, LLC. To the extent consistent with applicable law, Tacoma AG, LLC shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. All such risks shall be assumed by the Buyer. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TACOMA AG, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.



U.S. ENVIRONMENTAL PROTECTION
AGENCY

Office of Pesticide Programs
Registration Division (7505P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

EPA Reg. Number:

83520-8

Date of Issuance:

SEP 25 2007

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance: Conditional

Name of Pesticide Product:

Dicamba Technical Acid

Name and Address of Registrant (include ZIP Code):

Axxs USA, LLC
1100 Platte Falls Road
Platte City, MO 64709

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is registered in accordance with FIFRA sec. 3(c)(7)(A), provided that you make the following revisions:

1. Submit and/or cite all data required for the registration of this product when the Agency requires all registrants of similar product to submit data.
2. You may not use "cite all" for product-specific chemistry requirements. Submit the following data required for the registration of this pesticide product within 1 year from the date of this Notice of Registration:

<u>EPA Guideline Number:</u>	<u>Study Description:</u>
830.6317	Storage Stability
830.6320	Corrosion Characteristics
3. Add the statement, "EPA Reg. No. 83520-8."
4. Submit one copy of the final printed label before the product is released for shipment.

A stamped copy of the label is enclosed for your records.

Enclosure

Signature of Approving Official:

Joanne I. Miller
Product Manager 23
Herbicide Branch
Registration Division (7505P)

Date:

SEP 25 2007

Dicamba Acid Technical

For Manufacturing Purposes Only

Draft Label 03/05/2007
ACCEPTED
09/25/07
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
83520-8

Active Ingredient:

Dicamba: (3,6-dichloro-p-anisic acid).....98.5%
Related Compounds:.....1.5%
TOTAL.....100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
If Swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact [enter phone number] for emergency medical information.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

EPA Reg. No. 83520-X

EPA Est. No. XXXXX-XX-XXX

Net Weight:

Manufactured for:
Axss USA, LLC
1100 Platte Falls Road
Platte City, MO 64079

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only For Formulation Into A Herbicide For (1) The Following Use(s): Asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, wheat), sorghum (including sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, lawns, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms;

(2) Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with US EPA regulations.

This product may be used to formulate products for specific uses not listed on the MP label if the formulator, user group, or grower has complied with US EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in original container, in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained carefully swept up and collected for disposal. Wash area of spill with detergent and water.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

Container Disposal: Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Fiber Drums with Liners: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of liner in a sanitary landfill, or by incineration, if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Axss USA, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Axss USA, LLC. In no case shall Axss USA, LLC be liable for consequential, special or indirect damages resulting from the use or handling of this product. The exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. All such risks shall be assumed by the Buyer. AXSS USA, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Axess USA, LLC 1100 Platte Falls Road Platte City, MO 64079 (816) 431-9094	EPA Registration Number/File Symbol 83520-XX 8
Active Ingredient(s) and/or representative test compound(s) Dicamba Acid	Date September 18, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food, Terrestrial Non-Food, Domestic Outdoor	Product Name Dicamba Acid Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Sept. 18, 2007	Typed or Printed Name and Title Jane M. Miller, Agent
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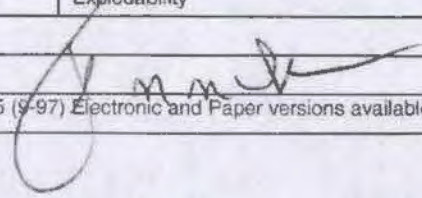
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401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date September 14, 2007			EPA Reg. No./File Symbol 83520-XXX		Page 1 of 6
Applicant's/Registrant's Name & Address			Product:		
AXSS USA, LLC 1100 Platte Falls Road Platte City, MO 64079			Dicamba Acid Technical		
Ingredient: Dicamba Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product Identity and Composition		AXSS USA, LLC	Own	
830.1600	Description of Materials Used to Produce the Product		AXSS USA, LLC	Own	
830.1620	Description of Production Process		AXSS USA, LLC	Own	
830-1650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities		AXSS USA, LLC	Own	
830.1700	Preliminary Analysis		AXSS USA, LLC	Own	
830.1750	Certified Limits		AXSS USA, LLC	Own	
830.1800	Enforcement Analytical Method		AXSS USA, LLC	Own	
830.1900	Submittal of Samples				2
830.6302	Color		AXSS USA, LLC	Own	
830.6303	Physical State		AXSS USA, LLC	Own	
830.6304	Odor		AXSS USA, LLC	Own	
830.6313	Stability to normal & elevated temp., metal, metal ion		AXSS USA, LLC	Own	
830.6314	Oxidation/Reduction		AXSS USA, LLC	Own	
830.6315	Flammability / Flame Extension				3
830.6316	Explosibility				4
Signature 			Name and Title		Date
			Jane M. Miller, Agent		09/14/2007

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

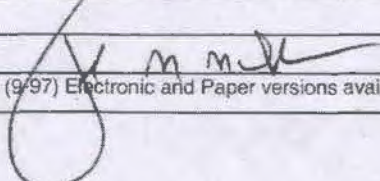
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DATA MATRIX

Date September 14, 2007			EPA Reg. No./File Symbol 83520-XXX		Page 2 of 6
Applicant's/Registrant's Name & Address			Product		
AXSS USA, LLC 1100 Platte Falls Road Platte City, MO 64079			Dicamba Acid Technical		
Ingredient Dicamba Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability	Cite-All		PAY	
830.6319	Miscibility				5
830.6320	Corrosion Characteristics	Cite-All		PAY	
830.6321	Dielectric Breakdown Voltage				6
830.7000	pH		AXSS USA, LLC	Own	
830.7050	UV/Visible Spectrum		AXSS USA, LLC	Own	
830.7100	Viscosity				7
830.7200	Melting Point/ Melting Range		AXSS USA, LLC	Own	
830.7300	Density		AXSS USA, LLC	Own	
830.7370	Dissociation Constant		AXSS USA, LLC	Own	
830.7550	Partition Coefficient		AXSS USA, LLC	Own	
830.7840	Water Solubility		AXSS USA, LLC	Own	
830.7950	Vapor Pressure	Cite-All		PAY	
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/14/2007

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

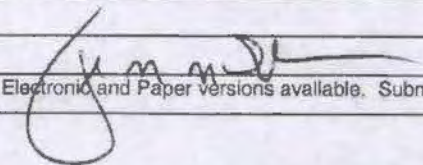
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WASHINGTON, D.C. 20460

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DATA MATRIX

Date September 14, 2007		EPA Reg. No./File Symbol 83520-XXX		Page 3 of 6	
Applicant's/Registrant's Name & Address		Product:			
AXSS USA, LLC 1100 Platte Falls Road Platte City, MO 64079		Dicamba Acid Technical			
Ingredient Dicamba Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Remaining data requirements including Acute Toxicity, Ecological Effects, Environmental Fate, Residue Chemistry, and all other generic data requirements, including task forces.		CITE-ALL	Bayer Advanced	Pay	
			Research Triangle Park, NC		
			Syngenta Crop Protection	Pay	
			Greensboro, NC		
			BASF Corporation	Pay	
			Research Triangle Park, NC		
			Albaugh, Inc.	Pay	
			Valdosta, GA		
			Spray Drift Task Force	Pay	
			Washington, DC		
			Nufarm Americas Inc.	Pay	
			Burr Ridge, IL		
Signature		Name and Title		Date	
		Jane M. Miller, Agent		09/14/2007	

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

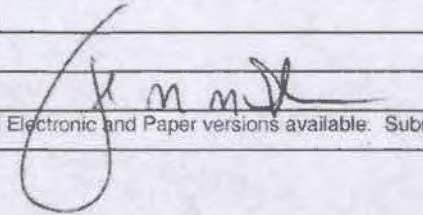
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date September 14, 2007		EPA Reg. No./File Symbol 83520-XXX		Page 4 of 6	
Applicant's/Registrant's Name & Address		Product			
AXSS USA, LLC 1100 Platte Falls Road Platte City, MO 64079		Dicamba Acid Technical			
Ingredient Dicamba Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Outdoor Residential Exposure Task	Pay	
			Washington, DC		
			Agricultural Reentry Task Force	Pay	
			Washington, DC		
			Monsanto Co.	Pay	
			Washington, DC		
			The Scotts Company	Pay	
			Marysville, OH		
			Agricultural Handlers Exposure TF	Pay	
			Macon, MO		
			PBI/Gordon Corp.		
			Kansas City, MO		
			Chemsico		
			St. Louis, MO		
			Gharda USA, Inc.		
			Newtown, PA		
Signature 			Name and Title		Date
			Jane M. Miller, Agent		09/14/2007

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

DATA MATRIX FOOTNOTES

1. **Description of Formulation Process:** Not applicable because the product is a TGA/MP.
2. **Submittal of Samples:** Not required at this time.
3. **Flammability / Flame Extension:** Not applicable. Product does not contain combustible liquids.
4. **Explodability:** Not applicable. Product is not potentially explosive.
5. **Miscibility:** Not applicable. Product is not intended for dilution with petroleum solvents.
6. **Dielectric Breakdown Voltage:** Not applicable. Product is not intended for use around electrical equipment.
7. **Viscosity:** Not required because product is a solid.

September 18, 2007

Ms. Kathryn Montague
PM Team 23, Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

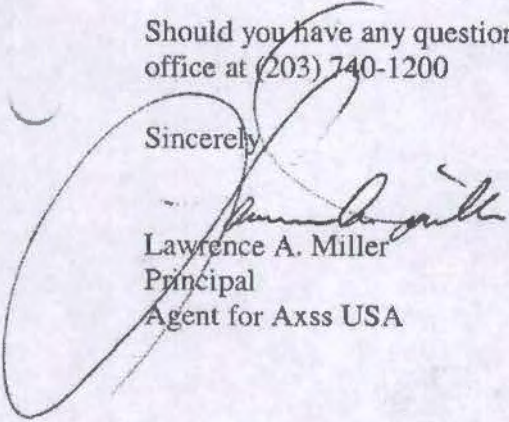
SUBJECT: "Dicamba Acid Technical"; EPA File Symbol 83520-I.

Dear Ms. Montague:

Please find the enclosed Certification with Respect to Citation of Data (EPA Form 8570-34) for the above-mentioned application.

Should you have any question or otherwise wish to reach me, please feel free to contact my office at (203) 740-1200

Sincerely,



Lawrence A. Miller
Principal
Agent for Axss USA

Note to File – 83520-I
Dicamba Technical Acid

September 19, 2007

The reviews by TRB/RD (D338381 and D338379, dated 8/14/07 and 8/13/07, respectively) found the CSF for this product to be acceptable, however, they determined that the product was not substantially similar to the EPA Registered product 42750-57, due to the new product listing an impurity of toxicological concern that was not listed on the source product's CSF. Upon further examination of the CSF and discussion with the registrant, it was determined that the laboratory had looked for the impurity of concern because it could potentially result from the manufacturing process. They did not find it at levels at or above 0.005 ppm, and it is reported on the CSF as <0.005 ppm. Therefore, we conclude that the impurity is not significantly present in 83520-I, and the CSF is acceptable as is. 83520-I is considered to be substantially similar to 42750-57, and the new application remains classified as a "me-too" (R31) action.

Kathryn Montague
RD/HB
703-305-1243



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 29 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Jane Miller
Agent for: Axxs USA, LLC
1100 Platte Falls Road
Platte City, MO 64709

Dear Ms. Miller:

Subject: Technical Dicamba Acid
EPA File Symbol No. 83520-I
Submission dated March 5, 2007

The application referred to above has been determined, pursuant to 40 CFR 152.105, not to be sufficiently complete to process; therefore, the application is considered deficient. Labeling/ other information as specified below must be submitted before the processing of the application can be completed. If such deficiencies cannot be corrected within 75 days, you must notify the Agency within those 75 days of the date you expect to complete the application. If, after 75 days, you do not respond, or you subsequently fail to complete the application within the scheduled times of completion, the Agency will terminate any action on the application, and will treat the application as if it has been withdrawn by the applicant. Any subsequent submission relating to the application must be submitted as a new application.

1. Your product cannot be determined toxicologically "substantially similar" to the cited product EPA Reg. No. 42750-57 for the following reasons:
 - a. Your product contains an impurity of toxicological significance which is not listed in the registered product. See the attached CONFIDENTIAL APPENDIX for identification of this impurity. A discussion on the formation of impurities of toxicological significance is absent from the application, and is required.
 - b. The decision to bridge acute toxicity data from any cited registered product cannot be made until the Agency is informed of the associated risk of the impurity in this product to man and the environment.
2. Your product cannot be determined "substantially similar" to the cited product EPA Reg. No. 42750-57 from the product chemistry standpoint for the following reasons:
 - a. The product contains an impurity of toxicological concern which is not listed in the cited product.
3. The CSF is not acceptable due to the presence of an impurity of toxicological concern not being identified as such.

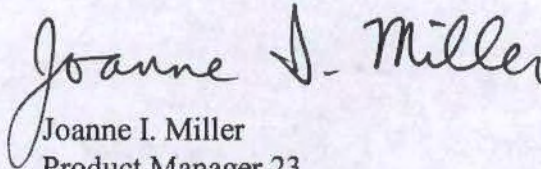
Page 2

EPA File Symbol: 83520-I

4. The submitted oxidation/reduction study (830.6314) is not acceptable, and must be upgraded.
5. Data for vapor pressure (830.7950) must be submitted or cited.
6. EPA form 8570-34, Certification with Respect to Citation of Data, must be submitted.

If you have any questions, please contact Kathryn Montague at 703-305-1243.

Sincerely,

A handwritten signature in cursive script that reads "Joanne I. Miller". The signature is written in dark ink and is positioned above the printed name and title.

Joanne I. Miller
Product Manager 23
Herbicide Branch
Registration Division (7505P)

CONFIDENTIAL APPENDIX

The impurity of toxicological concern is [REDACTED]

Manufacturing process information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

**TECHNICAL REVIEW BRANCH
SIMILARITY CLINIC DETERMINATION**

14/AUG/2007

MEMORANDUM

Subject: Name of Pesticide Product: Dicamba Acid Technical
EPA Reg. No. /File Symbol: 83520-I
DP Barcode: D338381
Decision No: 376555
PC Code: 029801
Action Code: R31

From: Eugenia McAndrew, Biologist *E. McAndrew*
Technical Review Branch
Registration Division (7505P) *Stacy A. Hitt*

To: Kathryn Montague, RM Team 23
Herbicide Branch
Registration Division (7505P)

Applicant: Axss USA, LLC
1100 Platte Falls Road
Platte City, MO 64079

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
128974 Dicamba	98.5
<u>Related Compounds:</u>	<u>1.5</u>
Total:	100.0%

ACTION REQUESTED: The Registrant has submitted an application for a new dicamba acid technical registration.

BACKGROUND:

Axss USA, LLC has applied for registration of Dicamba Acid Technical, EPA File Symbol 83558-I, claiming similarity to Albaugh Technical Dicamba Acid, EPA Reg. No. 42750-57, on EPA form 8570-1, dated March 5, 2007. According to the data matrix dated March 25, 2007 included in the submission, the Registrant has chosen the cite-all method of data support to satisfy the acute toxicity data requirements.

RECOMMENDATIONS:

TRB has evaluated the CSFs of the proposed technical product, 83520-I, and the cited registered product, 42750-57, and has determined that the two products are not substantially similar. The CSF dated March 5, 2007 submitted for the basic formulation of the proposed product indicates the presence of one impurity of toxicological significance which is not present in the registered dicamba technical acid.

The name of the impurity of toxicological significance is identified in the Confidential Appendix of the TRB Product Chemistry review (Mathur; D338379; 13/AUG/2007).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 12, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
Or Pay On-Line at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-376555
EPA File Symbol or Registration Number: 83520-I
Product Name: DICAMBA ACID TECHNICAL
EPA Receipt Date: 09-Mar-2007
EPA Company Number: 83520
Company Name: AXSS USA, LLC

BIOLOGIC, INC.
AXSS USA, LLC
115 OBTUSE HILL ROAD
BROOKFIELD, CT 06804-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R31

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: \$ 4,200 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S4900 Potomac Yard 1
2777 S. Crystal Dr.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee

Ombudsman at (703) 305-6249.

Sincerely,

Teresa Downs

Front End Processing Staff
Information Technology & Resources Management Division

Dicamba Acid Technical

For Manufacturing Purposes Only

Active Ingredient:

Dicamba: (3,6-dichloro-o-anisic acid).....98.5%
 Related Compounds:.....1.5%
 TOTAL.....100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
If Swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact [enter phone number] for emergency medical information.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

EPA Reg. No. 83520-X

EPA Est. No. XXXXX-XX-XXX

Net Weight:

Manufactured for:
 Axss USA, LLC
 1100 Platte Falls Road
 Platte City, MO 64079

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only For Formulation Into A Herbicide For (1) The Following Use(s): Asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, wheat), sorghum (including sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, lawns, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms;

(2) Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with US EPA regulations.

This product may be used to formulate products for specific uses not listed on the MP label if the formulator, user group, or grower has complied with US EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

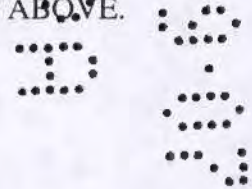
Storage: Store in original container, in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained carefully swept up and collected for disposal. Wash area of spill with detergent and water.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

Container Disposal: Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Fiber Drums with Liners: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of liner in a sanitary landfill, or by incineration, if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Axss USA, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Axss USA, LLC. In no case shall Axss USA, LLC be liable for consequential, special or indirect damages resulting from the use or handling of this product. The exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. At such risks shall be assumed by the Buyer. AXSS USA, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE, NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.



Dicamba Acid Technical

For Manufacturing Purposes Only

Active Ingredient:

Dicamba: (3,6-dichloro-o-anisic acid).....	98.5%
Related Compounds:.....	1.5%
TOTAL.....	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER**FIRST AID**

If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
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HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact [enter phone number] for emergency medical information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No. 83520-X

EPA Est. No. XXXXXX-XX-XXX

Net Weight:

Manufactured for:
 Axss USA, LLC
 1100 Platte Falls Road
 Platte City, MO 64079

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

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(2) Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

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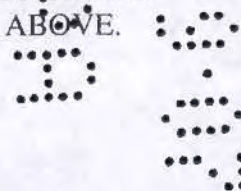
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CONDITIONS OF SALE AND LIMITATION OF WARRANTY

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Dicamba Acid Technical

For Manufacturing Purposes Only

Active Ingredient:

Dicamba: (3,6-dichloro-o-anisic acid).....98.5%

Related Compounds:..... 1.5%

TOTAL.....100.0%

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DANGER

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EPA Reg. No. 83520-X

EPA Est. No. XXXXX-XX-XXX

Net Weight:

Manufactured for:
 Axss USA, LLC
 1100 Platte Falls Road
 Platte City, MO 64079

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

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Dicamba Acid Technical

For Manufacturing Purposes Only

Active Ingredient:

Dicamba: (3,6-dichloro-*o*-anisic acid)..... 98.5%

Related Compounds:..... 1.5%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER**FIRST AID**

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EPA Reg. No. 83520-X

EPA Est. No. XXXXX-XX-XXX

Net Weight:

Manufactured for:
Axss USA, LLC
1100 Platte Falls Road
Platte City, MO 64079

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only For Formulation Into A Herbicide For (1) The Following Use(s): Asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, wheat), sorghum (including sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, lawns, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms;

(2) Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with US EPA regulations;

This product may be used to formulate products for specific uses not listed on the label if the formulator, user group, or grower has complied with US EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in original container, in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained carefully swept up and collected for disposal. Wash area of spill with detergent and water.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

Container Disposal: Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Fiber Drums with Liners: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of liner in a sanitary landfill, or by incineration, if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Axss USA, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Axss USA, LLC. In no case shall Axss USA, LLC be liable for consequential, special or indirect damages resulting from the use or handling of this product. The exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. All such risks shall be assumed by the Buyer. AXSS USA, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

FEE

BARCODE: D338379; Reg. No. : 83520-I PRODUCT: Dicamba Acid TGAI/MUP

Date: August 13, 2007

SUBJECT: Product Chemistry Review of Dicamba Acid TGAI/MUP

FROM: Shyam B. Mathur, PhD
Product Chemistry Team Leader
Technical Review Branch/RD (7505C)

S. B. Mathur
8/13/07
Jon

TO: Kathryn Montague / Joanne Miller, RM 23
Herbicide Branch / RD (7505C)

DP BARCODE: D338379
DECISION No.: 376555
File Symbol No.: 83520-I
PRODUCT: Dicamba Acid TGAI/MUP
PCC: 029801
REGISTRANT: Axss USA, LLC
USE: Herbicide, Food use

INTRODUCTION:

The registrant, Axss USA Incorporation, has submitted the product chemistry data to support the registration of the proposed dicamba acid technical produced by [REDACTED]. The registrant has submitted the product chemistry data corresponding to 830 series Subgroup A and subgroup B for the proposed dicamba acid technical. Based on the five batch analytical data, the registrant has provided the CSF for basic formulation (dated 03-05-07). The product chemistry data submitted have been assigned MRID Nos. 470756-01 & 470756-02. The registrant has claimed that the proposed dicamba acid technical is substantially similar to the registered Albaugh technical dicamba acid with Reg. No. 42750-57. TRB has been asked to evaluate the product chemistry data submitted for dicamba acid technical and determine its similarity to the registered technical dicamba acid.

SUMMARY OF FINDINGS:

1. The registrant has submitted a Confidential Statement of Formula for basic formulation (dated 03-05-07) for the dicamba acid technical. The average purity of the acid technical/MUP as determined by five batch analysis is 98.5%. The proposed certified limits for the AI and for the impurities are based on the standard certified limits set-forth in 40CFR§158.175(b)(2). The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.155 and 158.175 respectively [MRID No. 470756-01].
2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.160 [MRID No. 470756-01].

Product ingredient source information may be entitled to confidential treatment

BARCODE: D338379; **Reg. No. :** 83520-I **PRODUCT:** Dicamba Acid TGAI/MUP

3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.162. The production of dicamba is a batch process with [REDACTED]

[REDACTED] The details of the production process have been provided [MRID No. 470756-01].

4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.167. [REDACTED]

[REDACTED] as shown in the proposed basic CSF. The registrant also discussed the formation of impurities based on the theoretical reactions that could occur, but these impurities were not detected during the preliminary analysis reported by the registrant. The registrant has listed one impurity of toxicological significance in the CSF, but according to preliminary analysis report (GC-MS), this impurity was not detected in any of the five lots with LOQ established at 0.5 ppm and LOD of 0.005 ppm for this method. The registrant also performed the analysis of 17 dioxins by using high resolution GC-MS with LOQ of 1 ppm, but no dioxins were detected in the samples of dicamba acid [MRID No. 470756-02].

5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.170. The study was conducted under GLP requirements in compliance with 40CFR§160. Five representative batches of the dicamba acid technical were assayed for the dicamba acid and the impurities by HPLC employing an external standard technique with UV detection. This method employed a Agilent XDB C8, 150 x 4.6 mm, 5 µm column with UV detector operating at 230 nm. The HRGC-MS method was utilized for the determination of [REDACTED] with LOQ of 0.5 ppm and LOD of 0.005 ppm. The [REDACTED] was not detected in any of the five batches. The analyses were also performed to detect the presence of any dioxins, but were not found any of the batches [MRID No. 470756-02].

6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.180. The active ingredient dicamba acid was determined by HPLC/UV method. The analytical method was based on HPLC employing an external standard technique with UV detection. This method employed a Agilent XDB C8, 150 x 4.6 mm, 5 µm column with UV detector operating at 230 nm. The method was validated for precision, accuracy and linearity [MRID No. 470756-02].

7. The data submitted corresponding to guideline 830 Series Subgroup B (physical-chemical properties) for the dicamba acid technical satisfy the data requirements of 40CFR§158.190, except for one year storage stability (830.6317) and corrosion characteristics (830.6320) [MRID No. 470756-02].

Manufacturing process information may be entitled to confidential treatment

BARCODE: D338379; **Reg. No. :** 83520-I **PRODUCT:** Dicamba Acid TGAI/MUP

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for dicamba acid technical TGAI / MUP and has concluded that:

1. All the product chemistry data submitted corresponding to 830 Series Subgroup A and Subgroup B are acceptable, except for oxidation/reduction (830.6314), one year storage stability (830.6317), corrosion characteristics (830.6320), and vapor pressure (830.7950).
2. The CSF for basic formulation (dated 03-05-07) is acceptable.
3. The registrant must conduct and submit the results for one year storage stability (830.6317) and corrosion characteristics (830.6320) studies. It is recommended that the observations must be made at 0, 3, 6, 9, & 12 months intervals. The results must be submitted in electronic copy also along with hard copy.
4. The registrant must upgrade study corresponding to guideline 830.6314 (oxidation/reduction). The registrant has provided results of reduction studies but no tests were performed with oxidizing agents (e. g. with potassium permanganate). The applicant must perform the compatibility of the proposed product with an oxidizing agent and submit the results to the Agency. The registrant must also submit or cite data for the guideline 830. 7950 (vapor pressure).
5. The proposed dicamba acid technical (File symbol No. 83520-I) was determined not to be substantially similar to the registered dicamba technical with Reg. No. 42750-57. The CSF for basic formulation for the proposed indicated the presence of one impurity [REDACTED] of tox concern which is not present in the registered dicamba technical acid.

Manufacturing process information may be entitled to confidential treatment

BARCODE: D338379; **Reg. No. :** 83520-I **PRODUCT:** Dicamba Acid TGA/MUP

830.1550. Product identity & Composition: (MRID No. 470460-03)

Common Name: Dicamba acid technical

Chemical Name: 3, 6-dichloro-2-methoxybenzoic acid

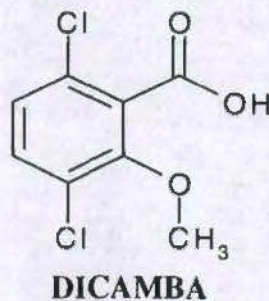
CAS No.: 1918-00-9

PC Code No.: 029801

Empirical formula: $C_8H_6Cl_2O_3$

Molecular Weight: 221.0

Structural formula:



BARCODE: D338379; Reg. No. : 83520-I PRODUCT: Dicamba Acid TGA/MUP

Table 1. Manufacturing and Impurity Data for dicamba acid technical				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	Basic CSF (03-05-07)	A	The NC of AI (98.5%) is supported by 5 batch analysis of the samples from the production site. [REDACTED] agrees with the label claim NC. [REDACTED] impurities ($\geq 0.1\%$) are listed on the CSF.
830.1600	Description of materials used to produce the product	470756-01	A	The MSDS specifications for all starting material used for the synthesis of dicamba acid technical have been provided by the registrant.
830.1620	Description of production process	470756-01	A	The production of dicamba acid is an integrated batch process involving five steps. The process has been described in full details. The reaction conditions, amounts of chemicals in each step, duration of time, and the yields in each step have been provided. The QA steps involved in each step have been described.
830.1670	Discussion of formation of impurities	470756-01	A	The applicant has provided the discussion on the formation of all the impurities formed and the potential impurities which may be formed based on theoretical consideration. The registrant has listed [REDACTED] impurities present at the levels of $\geq 0.1\%$. Discussion have been provided on the possible formation of [REDACTED] and Dioxins during the synthesis of dicamba acid technical.
830.1700	Preliminary analysis	470756-02	A	The registrant has provided 5 batch analysis for the dicamba acid TGA produced at [REDACTED] by HPLC/UV (230 nm). The impurities were identified & quantified by using HPLC-MS technique. High Resolution GC-MS technique was used to determine the presence of dioxins, if such impurities are formed. The methods were validated for accuracy, linearity, and precision. The five batch analysis supported the CSF for basic formulation.
830.1750	Certified limits	470756-02	A	The proposed certified limits for the AI and for the impurities are calculated based on standard certified limits set forth 40CFR158.175(b)(2).
830.1800	Enforcement analytical method	470756-02	A	The AI was assayed by using HPLC/UV method with UV detector operating at 230 nm.
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

Manufacturing process information may be entitled to confidential treatment

Product ingredient source information may be entitled to confidential treatment

BARCODE: D338379; **Reg. No. :** 83520-I **PRODUCT:** Dicamba Acid TGAI/MUP

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties of : Dicamba acid TGAI/MUP				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	C o l o r	470756-02	A	Tan
830.6303	Physical state	470756-02	A	Semi-granular solid
830.6304	Odor	470756-02	A	Similar to chlorinated aromatic compounds
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	470756-02	A	Stable at normal & elevated temperatures (54°C for 2 weeks). Stable to iron, iron filings, and Al metals and corresponding acetate salts.
830.6314	Oxidation/reduction: chemical incompatibility	470756-02	U	No reaction when placed in contact with water, mono-ammonium phosphate, iron powder or ferric chloride. No tests were performed with an oxidizing Agent.
830.6315	Flammability		NA	
830.6316	Explosibility		NA	
830.6317	Storage stability		G	No data submitted
830.6319	Miscibility		NA	
830.6320	Corrosion characteristics		G	No data submitted
830.7000	pH	470756-02	A	1.86 at 25°C (1% aqueous suspension)
830.7050	UV/Visible absorption	470756-02	A	Note 1
830.7100	Viscosity		NA	
830.7200	Melting point	470756-02	A	112.6- 114.9°C
830.7220	Boiling point		NA	
830.7300	Bulk Density	470756-02	A	0.606 g/ml
630.7370	Dissociation constants in water (DC)	470756-02	A	pKa = 1.93
830.7550	Partition coefficient	470756-02	A	Log P = 2.76 @ 23°C
830.7840	Water solubility	470756-02	A	Solubility in (g/100 ml) at 25°C: water (0.757); MeOH (99.9), n-octanol (52.7), n-hexane (0.356)
830.7950	Vapor pressure		G	No data provided

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Upgrade (additional information required)

BARCODE: D338379; **Reg. No. :** 83520-I **PRODUCT:** Dicamba Acid TGAI/MUP

Note 1. 830.7050 (UV/VIS): (MRID No. 470756-02)

An absorbance band in the 274-282 range was observed in water, 0.1M NaOH, and 0.1M HCl. A slight shift towards higher wavelength was observed for acidic test substance solution with a corresponding increase in the extinction coefficient/. Additional bands at lower wavelengths (202-203 nm) range were observed for solutions prepared in DI water, 0.1M HCL. The band was not observed in the NaOH solutions. A band at 222 nm was observed in all solutions.

830.1800. Enforcement analytical method (Method No. 486G124B-2): (MRID No. 470756-02)

The active ingredient in the dicamba acid TGAI/MUP was assayed by HPLC employing an external standard technique with UV detector (230 nm) in reversed phase mode. The technical dicamba was diluted in acetonitrile and assayed by HPLC with UV detector.

Equipment & Parameters

HPLC: Jasco PU980 pump, ThermoSeparations AS3000 Autosampler, Jasco Scanning UV-975 detector

Column: Agilent XDB C8, 5 μ m, 150 mm x 4.6 mm

Column temperature: Ambient

Injection volume: 2 μ L

Flow rate: 1.0 ml/min

Program: isocratic (30 min)

Detector: UV operating at 230 nm

Gradient Program: Mobile phase: A = Phosphoric acid solution (pH=2.7); B = Acetonitrile

Time (min)	% A	% B
0	65	35
15.0	65	35
15.1	10	90
20.0	10	90
20.1	65	35
30.0	65	35

BARCODE: D338379; **Reg. No. :** 83520-I **PRODUCT:** Dicamba Acid TGAI/MUP

CONFIDENTIAL APPENDIX

Chemical	Dicamba Acid Technical	Registration No.	83520-I	DP Barcode	338379
CB Number		Product Type	98.5%	Test Substance	TGAI/MUP

Group A-GLNS 830.1550, 830.1600, 830.1620, 830.1650, 830.1670, 830.1700, 830.1750, & 830.1800: Composition (CSF), Impurities, Preliminary analysis, and Analytical Methods

Manufacturing process information may be entitled to confidential treatment

BARCODE: D338379; **Reg. No. :** 83520-I **PRODUCT:** Dicamba Acid TGAI/MUP

Confidential appendix



Manufacturing process information may be entitled to confidential treatment

**Fees For Service Screen
83520-1**

The Administrative Paperwork is not complete. The Certification with Respect to Citation of Data, EPA Form 8570-34, must be submitted. This product does not qualify for the formulator's exemption for their source of active ingredient; a new unregistered source of active ingredient.

→ no, they are using Albacore (1998)

This submission is complete enough to start review of the product chemistry data and route to the Acute Toxicity Similarity Clinic to determine if substantially similar to the cited me-too product 42750-57.

Fee for Service

{806631É~

This package includes the following

- New Registration
- Amendment

✓ Studies? Fee Waiver?
volpay % Reduction: ____

for Division

- AD
- BPPD
- RD

Risk Mgr. 23

Receipt No.

S-

806631

EPA File Symbol/Reg. No.

83520-I

Pin-Punch Date:

3/9/2007

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R-31

Granted:

R-31

Amount Due: \$ 4,200

Parent/Child Decisions:

Reviewer: RKumar

Date: 3-12-07

Remarks:

BIOLOGIC INC.

agribusiness professionals

March 7, 2007

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Room S-4900, 4th Floor
Arlington, VA 22202

Attention: Ms. Joanne Miller (PM #23)
RE: 83520-XXX, "Dicamba Acid Technical"; Me-Too
Application for Pesticide Registration

Dear Ms. Miller:

On behalf of Axss USA, LLC we are submitting this Application for Pesticide Registration (EPA Form 8570-1) for the above mentioned product. The following documents are submitted in support of this application for a "Me-Too" product, old AI:

Volume 1 Administrative Materials

- Application for Pesticide Registration; EPA Form 8570-1
- Data Matrix; EPA Form 8570-35
- EPA Confidential Statement of Formula; EPA Form 8570-4
- Five (5) copies of draft labeling

3 copies of the following documents:

47075601 Volume 2 Product Identity and Composition of Dicamba Acid TGAI; Selected Studies to Fulfill OPPTS Guideline Series 830 in Accordance With 40 CFR Part 158.155, 158.160, 158.162 and 158.167; Description of Materials Used to Produce the Product; Description of Production Process; and Discussion of Formation of Impurities.

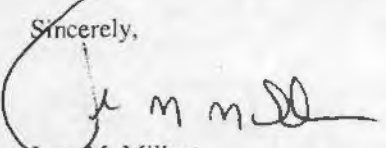
47075602 Volume 3 Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical Dicamba

Please be advised that this application is supported by the cite-all option in accordance with FIFRA 3(c)(1)(D). Letters of intent have been sent to all companies listed on the September 30, 2006 Data Submitters List indicating that Axss USA, LLC has applied for the registration of "Dicamba Acid Technical". Furthermore, Axss USA, LLC is prepared to send offer to pay letters and submit its Certification with Respect to Citation of Data (EPA Form 8570-34) when the Agency notifies us that such certification is required to issue a registration notice for this product.

This registration action will fall within the PRIA category as stated in Table 4 - Registration Division: New Products as published in the Wednesday March 17, 2004 Federal Register. This action is further defined under EPA No. R31; CR No. 86 as a "New Product", "Non-Fast Track". The PRIA fee for this registration action is therefore \$4,200 and the decision time frame is 6 months.

Should you have any questions or wish to reach me, please feel free to contact my office at 203-740-1200.

Sincerely,


Jane M. Miller
Agent for Axss USA, LLC



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

631

Application for Pesticide - Section I

1. Company/Product Number 83520-XXX <u>1</u>	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dicamba Acid Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Axss USA, LLC 1100 Platte Falls Road Platte City, MO 64079 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>42750-57</u> Product Name <u>Technical Dicamba Acid</u>	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application for a new pesticide product will fall within the category on Table 4 - Registration Division: New Products as published in the June 2, 2005 Federal Register. This product is further defined under EPA No. 31; CR No. 86 as a "New Product", "Non-Fast Track." Axss USA, LLC is submitting product chemistry and using the cite-all option of support for any data that may be applicable to this registration action. The PRIA fee for this application is \$4,200.

Miller Tel: (203) 740-1200; Fax: (203) 740-1220; Email: jmill@biologicconsulting.com

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) <u>fibre board</u>	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 kg		5. Location of Label Directions <input checked="" type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Jane M. Miller		Title Agent	
		Telephone No. (Include Area Code) 203-740-1200	
<p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>			
2. Signature 		3. Title Agent	
4. Typed Name Jane M. Miller		5. Date March 5, 2007	
6. Date Application Received (Stamped) 			

73



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 13, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AXSS USA, LLC
115 OBTUSE HILL ROAD
BROOKFIELD, CT 06804-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 09-MAR-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

BIOLOGIC INC.
agribusiness professionals

March 7, 2007

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Room S-4900, 4th Floor
Arlington, VA 22202

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RE: 83520-XXX, "Dicamba Acid Technical"; Me-Too
Application for Pesticide Registration

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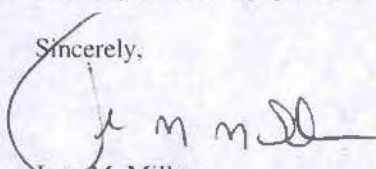
Volume 3 Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical Dicamba

Please be advised that this application is supported by the cite-all option in accordance with FIFRA 3(c)(1)(D). Letters of intent have been sent to all companies listed on the September 30, 2006 Data Submitters List indicating that Axss USA, LLC has applied for the registration of "Dicamba Acid Technical". Furthermore, Axss USA, LLC is prepared to send offer to pay letters and submit its Certification with Respect to Citation of Data (EPA Form 8570-34) when the Agency notifies us that such certification is required to issue a registration notice for this product.

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Should you have any questions or wish to reach me, please feel free to contact my office at 203-740-1200.

Sincerely,


Jane M. Miller
Agent for Axss USA, LLC

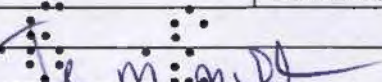
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date March 5, 2007		EPA Reg. No./File Symbol 83520-XXX		Page 1 of 6	
Applicant's/Registrant's Name & Address		Product:			
AXSS USA, LLC 1100 Platte Falls Road Platte City, MO 64079		Dicamba Acid Technical			
Ingredient Dicamba Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product Identity and Composition		AXSS USA, LLC	Own	
830.1600	Description of Materials Used to Produce the Product		AXSS USA, LLC	Own	
830.1620	Description of Production Process		AXSS USA, LLC	Own	
830-1650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities		AXSS USA, LLC	Own	
830.1700	Preliminary Analysis		AXSS USA, LLC	Own	
830.1750	Certified Limits		AXSS USA, LLC	Own	
830.1800	Enforcement Analytical Method		AXSS USA, LLC	Own	
830.1900	Submittal of Samples				2
830.6302	Color		AXSS USA, LLC	Own	
830.6303	Physical State		AXSS USA, LLC	Own	
830.6304	Odor		AXSS USA, LLC	Own	
830.6313	Stability to normal & elevated temp., metal, metal ion		AXSS USA, LLC	Own	
830.6314	Oxidation/Reduction		AXSS USA, LLC	Own	
830.6315	Flammability / Flame Extension				3
830.6316	Explosibility				4
Signature 			Name and Title		Date
			Jane M. Miller, Agent		03/05/2007

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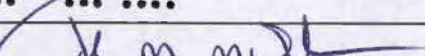
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401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date March 5, 2007			EPA Reg. No./File Symbol 83520-XXX		Page 2 of 6
Applicant's/Registrant's Name & Address			Product		
AXSS USA, LLC 1100 Platte Falls Road Platte City, MO 64079			Dicamba Acid Technical		
Ingredient Dicamba Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability	Cite-All		PAY	
830.6319	Miscibility				5
830.6320	Corrosion Characteristics	Cite-All		PAY	
830.6321	Dielectric Breakdown Voltage				6
830.7000	pH		AXSS USA, LLC	Own	
830.7050	UV/Visible Spectrum		AXSS USA, LLC	Own	
830.7100	Viscosity				7
830.7200	Melting Point/ Melting Range		AXSS USA, LLC	Own	
830.7300	Density		AXSS USA, LLC	Own	
830.7370	Dissociation Constant		AXSS USA, LLC	Own	
830.7550	Partition Coefficient		AXSS USA, LLC	Own	
830.7840	Water Solubility		AXSS USA, LLC	Own	
830.7950	Vapor Pressure				8
Signature 			Name and Title		Date
			Jane M. Miller, Agent		03/05/2007

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Applicant's/Registrant's Name & Address		Product:			
AXSS USA, LLC 1100 Platte Falls Road Platte City, MO 64079		Dicamba Acid Technical			
Ingredient Dicamba Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Remaining data requirements including Acute Toxicity, Ecological Effects, Environmental Fate, Residue Chemistry, and all other generic data requirements, including task forces.		CITE-ALL	Bayer Advanced	Pay	
			Research Triangle Park, NC		
			Syngenta Crop Protection	Pay	
			Greensboro, NC		
			BASF Corporation	Pay	
			Research Triangle Park, NC		
			Albaugh, Inc.	Pay	
			Valdosta, GA		
			Spray Drift Task Force	Pay	
			Washington, DC		
		Nufarm Americas Inc.	Pay		
		Burr Ridge, IL			
Signature			Name and Title	Date	
			Jane M. Miller, Agent	03/05/2007	

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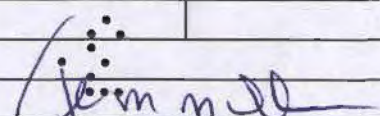
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AXSS USA, LLC 1100 Platte Falls Road Platte City, MO 64079		Dicamba Acid Technical			
Ingredient Dicamba Acid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Outdoor Residential Exposure Task	Pay	
			Washington, DC		
			Agricultural Reentry Task Force	Pay	
			Washington, DC		
			Monsanto Co.	Pay	
			Washington, DC		
			The Scotts Company	Pay	
			Marysville, OH		
			Agricultural Handlers Exposure TF	Pay	
			Macon, MO		
			PBI/Gordon Corp.		
			Kansas City, MO		
			Chemsico		
			St. Louis, MO		
			Gharda USA, Inc.		
			Newtown, PA		
Signature 			Name and Title		Date
			Jane M. Miller, Agent		03/05/2007

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DATA MATRIX FOOTNOTES

1. **Description of Formulation Process:** Not applicable because the product is a TGAI/MP.
2. **Submittal of Samples:** Not required at this time.
3. **Flammability / Flame Extension:** Not applicable. Product does not contain combustible liquids.
4. **Explodability:** Not applicable. Product is not potentially explosive.
5. **Miscibility:** Not applicable. Product is not intended for dilution with petroleum solvents.
6. **Dielectric Breakdown Voltage:** Not applicable. Product is not intended for use around electrical equipment.
7. **Viscosity:** Not required because product is a solid.
8. **Vapor Pressure:** Not required since Dicamba Acid is a solid at ambient temperatures and would therefore have negligible vapor pressure under normal storage conditions.

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206 2

Dicamba Acid Technical

For Manufacturing Purposes Only

Active Ingredient:

Dicamba: (3,6-dichloro-o-anisic acid)..... 98.5%
 Related Compounds:..... 1.5%
 TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER**FIRST AID**

If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
If Swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact [enter phone number] for emergency medical information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No. 83520-X

EPA Est. No. XXXXX-XX-XXX

Net Weight:

Manufactured for:
 Axss USA, LLC
 1100 Platte Falls Road
 Platte City, MO 64079

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only For Formulation Into A Herbicide For (1) The Following Use(s): Asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, wheat), sorghum (including sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, lawns, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms;

(2) Uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with US EPA regulations.

This product may be used to formulate products for specific uses not listed on the MP label if the formulator, user group, or grower has complied with US EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in original container, in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained carefully swept up and collected for disposal. Wash area of spill with detergent and water.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

Container Disposal: Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Fiber Drums with Liners: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of liner in a sanitary landfill, or by incineration, if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Axss USA, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Axss USA, LLC. In no case shall Axss USA, LLC be liable for consequential, special or indirect damages resulting from the use or handling of this product. The exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. All such risks shall be assumed by the Buyer. AXSS USA, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

